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## MEMO ENDORSED

March 18, 2015

**VIA ECF**

Honorable Colleen McMahon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: **Clarke v. Trans Union, LLC et al.**  
**Docket No. 13-cv-02991-CM-AJP**

Dear Judge McMahon:

We represent Defendant LVNV Funding, LLC ("LVNV") in the above-referenced matter. On behalf of Defendants LVNV, Experian Information Solutions, Inc. ("Experian") and Trans Union, LLC ("Trans Union") and Equifax Information Services, LLC ("Equifax"), we respectfully request that the Court stay discovery and all other deadlines in this case in light of the motion to withdraw by Plaintiff's counsel, which was filed on March 13, 2015, and the referral to Magistrate Peck for resolution of outstanding discovery disputes. While Defendants LVNV, Experian, Trans Union and Equifax do not take a position regarding the withdrawal motion, we respectfully submit that a stay of discovery and the interim deadlines would provide all parties with the opportunity to avoid the incurrence of defense costs until the motion to withdraw is decided and until new counsel is retained for Plaintiff, if ever.

We thank the Court for its consideration in this matter.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By: s/ Concepcion Montoya  
Concepcion A. Montoya

cc: All Counsel (Via ECF)

3/19/2015  
No stay. I will submit after the issue is decided. Meanwhile, your defendants should start on strong motion proceedings quickly.  
C